

# EXHIBIT 17

1                         UNITED STATES DISTRICT COURT  
2                         FOR THE NORTHERN DISTRICT OF OHIO  
3                         EASTERN DIVISION  
4                         - - -  
5     IN RE:  NATIONAL                         :  
6                         PRESCRIPTION                         :  MDL No. 2804  
7     OPIATE LITIGATION                         :  
8                         \_\_\_\_\_  
9                         :  Case No.  
10                        :  1:17-MD-2804  
11                        THIS DOCUMENT RELATES                 :  
12                        TO ALL CASES                         :  Hon. Dan A. Polster  
13                         - - -  
14                        Friday, December 21, 2018  
15                        HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
16                         CONFIDENTIALITY REVIEW  
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18                        - - -  
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20                        - - -  
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22                        Videotaped deposition of PETER RATYCZ, held at  
23                        the offices of Cavitch, Familo & Durkin,  
24                        1300 East Ninth Street, Cleveland, Ohio, commencing at  
25                        8:59 a.m., on the above date, before Carol A. Kirk,  
26                        Registered Merit Reporter and Notary Public.

27                        GOLKOW LITIGATION SERVICES  
28                        877.370.3377 ph | 917.591.5672 fax  
29                        deps@golkow.com  
30

1 Q. Okay. Why not?

2 A. Because we do have a procedure --

3 what happened here is that -- this was tied to

4 our VAWD accreditation. And there's some

5 background on that. We thought we needed to

6 have this VAWD accreditation. VAWD stands for

7 Verified Accredited Wholesaler Distributor.

8 And this accreditation is for

9 anybody who's selling, you know, medications.

10 It was a requirement by a payer to have this in

11 place. There was a gray area there in our

12 interpretation. And I'll answer your question.

13 It's just some background there.

14 Q. No, no. Please continue.

15 A. There was a gray area there that

16 we did not -- since we're a distributor to our

17 own stores, whether we needed that. Because

18 we're not distributing to a customer.

19 Essentially our stores, I guess, are our

20 customer.

21 So we didn't think we needed it.

22 It was recommended that we go through this VAWD

23 accreditation process. We got halfway through

24 that process. The payer said, "No, you don't